

Planning Statement

including Community Involvement Statement, Affordable Housing Statement, Sustainability Statement and Lighting Assessment.

Erection of 194 No. dwellings, means of access, public open space, play areas, associated infrastructure and landscaping.

Land off St George's Avenue, Havant

On behalf of Barratt Developments PLC
August 2021



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Town Planning ► Development Consultancy



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Executive Summary

Henry Adams LLP act on behalf of Barratt Developments PLC in respect of the submission of a detailed application for the erection of 194 new residential dwellings on land off St George's Avenue, Havant.

This Statement demonstrates the following key points:

- The site is allocated for residential as part of emerging Local Plan Policy H15.
- The Council cannot currently demonstrate a suitable supply of housing to meet its needs; 4.4 years (June 2021).
- The proposal will support social sustainability by providing a mix of dwellings, including in excess of 35% 2 bedroom properties.
- Retention of existing trees alongside ecological and biodiversity enhancements through the landscaping proposals will result in biodiversity gains and environmental benefits.
- The provision of community food growing via the provision of a community orchard.
- Economic benefits will include the creation/maintenance of construction jobs and additional spending by new residents on local goods and services.

This application represents a comprehensive and sustainable development proposal. It reflects the three essential strands of sustainable development delivering economic, social and environmental benefits to the local area. Given the draft allocation alongside the absence of any clear reason for refusal, the significant benefits in favour of the development would significantly outweigh any harm and the principle should be considered acceptable.

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1. **Introduction**

1.1 This statement sets out the relevant background for determination of the planning application, including context of the site and surroundings, details of the proposed development and an assessment of the relevant planning considerations. This Statement incorporates the following:

- Affordable Housing Statement
- Statement of Community Involvement
- Sustainability Statement
- Lighting Assessment
- Draft Heads of Terms

1.2 The proposals have been informed by the policies in the National Planning Policy Framework (NPPF), Havant Local Plan and relevant Supplementary Planning Documents. Given that the site has been allocated for development within the Emerging, Pre-Submission Version Local Plan (Nov 2020), this has also been given due consideration.

1.3 In addition to this Statement, the following documents are submitted as part of the planning application:

Report	Consultant
Planning Statement	Henry Adams LLP
Plans: Please see drawing issue sheet.	Carlton Design Partnership
Design and Access Statement	Carlton Design Partnership
FRA and Drainage Strategy	RJ Engineers
Transport Assessment Travel Plan	Paul Basham Associates
Preliminary Ecology Assessment (PEA) GCN eDNA Survey/Report HRA	Tetra Tech
Nutrient Budget/Balancing Assessment	Tetra Tech
Arboricultural Impact Assessment & Method Statement Tree Protection Plan Tree Constraints Assessment	Mark Hinsley Arboricultural Consultants Ltd

Tree Constraints Plan	
Heritage Statement & Archaeology Assessment	RPS Group
Geophysical Survey Report	Sumo Survey
Noise Impact Assessment	24 Acoustics
Air Quality Assessment	Tetra Tech
CIL forms	Henry Adams LLP

2. Site and Surrounds

- 2.1 The Site comprises a relatively flat, open, triangular shaped agricultural field bound by the A27 to the south/south-east, the Havant-Brighton rail line which runs to the north and a rectangular field which runs parallel to the western boundary. Whilst within 1 ownership, the application site does not include the entire field due to the need to safeguard land on the eastern edge for a future link road to serve draft allocation KP5 Southleigh, as denoted on the emerging Local Plan Policy Map.
- 2.2 The northern and western boundaries are denoted by planting which comprises a mixture of trees and hedging whilst the south-eastern boundary is open given the subdivision of the field to allow for the safeguarded access land.

Surrounds

- 2.3 The Site is located to the east of the Warblington area of Havant. It is within 0.5 miles of a number of local services including; Warblington Train Station, Warblington School, The Avenue Lawn Tennis, Squash and Fitness Club, and a One Stop corner shop. East Street, Havant is also within 1 mile of the site providing additional services, employment and shopping facilities.
- 2.4 There are a number of cycle lanes and cycle paths on both roads and lit footways within the immediate area linking to central Havant. A number of bus stops are also located on Emsworth Road and Southleigh Road. The level of accessibility demonstrates that the site is situated within a sustainable location.
- 2.5 This Site and the adjoining field to the west form part of draft allocation H15 Land east of Castle Avenue, allocated for the delivery of 200 dwellings within the Pre-submission version of the Emerging Local Plan (Nov 2020). The field to the west benefits from planning consent for 69 dwellings (APP/18/01033). This proposal provides an access from St George's Avenue to the Site boundary.

3. Planning History

- 3.1 The application site is not subject to any planning history, although the land to the west of the site, which also forms part of the draft allocation Policy H15, is subject to the following planning consent:

Application Reference	Proposal	Decision
APP/18/01033	Residential development comprising 69 No. dwellings with access from St George's Avenue together with access, car parking, landscaping, electrical substation and associated works.	Approved – 14 01 2021

4. The Proposal

4.1 The proposal is for the development of 194 new residential dwellings, comprising a mix of 1-4 bed properties. The site is approximately 5.4 ha in size and thus the development of 194 dwellings has a gross density of 35 dwellings per hectare (dph). This density is considered to be appropriate to the location and commensurate with the character of the area and residential consent to the west.

4.2 The dwellings will consist of two-storey detached, semi-detached and terraced properties. 30% (58) properties will also be provided as tenure blind, affordable homes. The proposed properties exceed minimum space standards as set out within the accommodation schedule (Appendix A). In summary, the application proposes the following mix:

136 Market Dwellings (70%)

- 49 no. 2 bed properties
- 51 no. 3 bed properties
- 35 no. 4 bed properties

58 Affordable Dwellings (30%)

- 10 no. 1 bed properties
- 39 no. 2 bed properties
- 18 no. 3 bed properties
- 2 no. 4 bed properties

4.3 In terms of design, the proposed elevations would comprise a mix of red and multi red brickwork, with render to feature buildings. Buildings will vary from 2 to 3 storeys with a mix of hipped and gable ended roofs. There will be a range of detached, semi-detached, terraced and apartment buildings interspersed around the site. Design variations will include door canopies, dormers and bay windows. Detailing will include contrasting brick surrounds to doors and some windows, mid and plinth level string courses, contrasting brick stretchers over windows and some use of contrasting brick plinths. The dwellings are positioned to form an outward facing development, where possible, but a need to provide noise mitigation has informed the design and position of dwellings adjoining the northern and southern boundaries.

4.4 Noise attenuation on northern and southern boundary is also proposed. Dwelling design also considers noise in design and form of the dwellings.

- 4.5 The site is currently accessed via a field gate on the southern boundary. The proposed access arrangement will comprise an extension from St George's Avenue through the consented scheme to the west.
- 4.6 Pedestrian and cycle access will also be provided throughout the site, linking into St George's Avenue and beyond. This provides a safe off-road route for pedestrians wanting to go access local public transport on Southleigh Road, Warblington Train Station and local schools.
- 4.7 Parking Provision is in accordance with the Parking SPD, providing 443 parking spaces, 49 of which are visitor spaces. Electric charging points will be provided and cycle parking will be provided within garden sheds.
- 4.8 The scheme seeks to retain the majority of existing trees and hedges, which will become established features within the periphery of the site. Additional planting of trees and shrubs is proposed on the southern boundary to add to the feel of being set within the landscape, whilst additional planting on the street frontage will create breaks in the built form and areas of parking. Areas of public open space and rear gardens will be planted with native species to support and enhance both local biodiversity and the character of the area. The central open space will also be planted to create community growing opportunities in the form of a small orchard.

5. Pre-Application Consultation

Havant Borough Council

- 5.1 A pre application request was submitted to the Council in January 2021, and a written response was received on 12th April 2021 (Appendix B).
- 5.2 The response sets out the principle of development, concluding that whilst the proposals would be contrary to the adopted Local Plan, in that the site is located outside of the urban area. By contrast, the submission Local Plan includes the site as part of allocation Policy H15. The emerging Local Plan is now a material consideration in the assessment of any application and thus the allocation must be given weight.
- 5.3 Some of the other key points raised through the pre application response are as follows;
- A table of compliance will be needed to demonstrate that the proposal satisfies all other policies within the emerging Local Plan (completed at Appendix C).
 - Long runs of parking bays need to be broken up by landscaping.
 - The Open Space needs to consider Policies E9 and E11 for food growing and types of leisure and recreation provision.
 - Garden lengths and proximity/impact on neighbouring properties needs to be fully considered.
 - Further investigation into noise considerations and overheating would be required.

West Sussex County Council Highway Department

- 5.4 The Highways Authority were consulted prior to the application submission. The response was received in April 2021 and concluded the following:
- The internal layout should not impact on the delivery of A27 improvements, pedestrian and cycle connectivity to the north or the delivery of the site to the west.
 - 20 mph design speed is required.
 - The Scope of the Junction Assessment was agreed.
 - A Framework Travel Plan would need to be submitted.
 - A Non Motorised User Provision Report is required.

6. Community Involvement Statement

- 6.1 Consultation has taken place with the Local Ward Members, nearby residents and Residents Association prior to the submission of this application. All parties were contacted in February 2021 and provided with an illustrative masterplan and letter summarising the quantum of development (196 dwellings), point of access and key considerations that demonstrate compliance with emerging Policy H15.

Ward Members

- 6.2 Ward members felt that a sustainable development could be achievable on site, but that there were some concerns that primarily related to transport considerations:

- Traffic impacts;
- Relationship with the proposed link road to the east;
- Potential to provide cycle connectivity;
- Sustainable transport and connections with existing bus services; and
- Parking and the impacts any overspill may have for existing residents.

Warblington and Denvilles Residents Association

- 6.3 The response received from the Association clearly noted that there was no objection to the principle of development, given that there is a national and local need for new housing. However, their response did highlight some areas that they felt required further consideration;

- Cumulative impact of traffic through St George's Avenue which could present a safety hazard for emergency vehicles and cyclists given that it forms part of National Cycle Route 2;
- Safety hazards associated with the construction traffic using St George's Avenue for both this site and the adjoining Persimmon site;
- Parking restrictions preventing new residents from parking commercial and recreational vehicles on driveways or the road which leads to parking on adjacent residential roads;
- Noise impacts for new residents from the A27 and the rail line; and
- Concerns over the size and amount of open space.

Local Residents

- 6.4 Comments highlighted a number of matters that could be given further consideration, namely:
- Access through St George's Avenue would be undesirable for existing residents;
 - Construction access and the possibility of this being provided to the south of the site;
 - The cumulative impact of increased traffic;
 - Noise from the A27 and the rail line and how this would impact new residents; and
 - Development density being out of character with existing development on surrounding streets.
- 6.5 In order to further consider and address the key points raised through the consultation, the applicant has employed the services of both transport and noise consultants. Traffic modelling, parking provision, sustainable transport, safety considerations and the location of the future link road have informed the final proposal and have been set out in further detail within the submitted Transport Assessment and Travel Plan. Noise surveys have been completed and informed the noise attenuation measures, location and orientation of dwellings and the siting of open space.

7. **Planning Policy**

7.1 Section 38 (6) of the Planning and Compulsory Act 2004 and Section 70 (2) of the Town and Country Planning Act 1990 requires planning applications to be determined in accordance with the policies of the Development Plan unless material considerations indicate otherwise.

7.2 The Development Plan comprises:

- Havant Local Plan Core Strategy (2011) and Allocations (2014)
- Borough Design Guide SPD (2011)
- Housing SPD (2011)
- Parking SPD (2016)
- Hampshire Minerals and Waste Plan

7.3 Whilst not yet formally adopted, the Emerging Local Plan has now reached examination stage with the Examination due to start in July 2021. Whilst not currently forming part of the Development Plan, it should still be a material consideration in the assessment of this planning application in accordance with NPPF paragraph 48.

7.4 The specific policies of relevance to this application are summarised in the list below.

Havant Local Plan Core Strategy

- CS9 Housing
- CS17 Concentration and Distribution of Development within the Urban Areas
- AL2 Urban Area Boundaries and Undeveloped Gaps between Settlements
- CS21 Developer Requirements
- DM6 Coordination of Development
- DM8 Conservation, Protection and Enhancement of Existing Natural Features
- DM10 Pollution
- DM13 Car and Cycle Parking on Residential Development
- DM23 Sites for Brent Geese and Waders
- DM24 Recreational Disturbance to Special Protected Areas (SPAs) from Residential Development

Emerging Local Plan

- DR1 Delivery of Sustainable Development
- DR2 Regeneration
- IN1 Effective Provision of Infrastructure
- IN2 Improving Transport Infrastructure
- IN3 Transport and Parking in new development

- IN5 Future Management and Management Plans
- E1 High Quality Design
- E2 Health and wellbeing
- E3 Landscape and settlement boundaries
- E6 Best and most versatile agricultural land
- E9 Provision of public open space in new development
- E12 Low Carbon Design
- E13 Historic Environment and heritage assets
- E14 The Local Ecological Network
- E15 Protected Species
- E16 Solent Special Protection Areas
- E17 Solent wader and Brent Goose feeding and roosting sites
- E18 Trees, hedgerows and woodland
- E19 Managing flood risk and woodland
- E19 Managing flood risk in new development
- E20 Drainage infrastructure in new development
- E22 Amenity and pollution
- H1 High Quality Homes
- H2 Affordable Housing
- H3 Housing Density
- H4 Housing Mix
- H15 Land east of Castle Avenue

National Planning Policy Framework and Guidance

- 7.5 At National level the National Planning Policy Framework sets out the Government's most up-to-date policies against which all Development Plans should be prepared, and planning applications assessed. It is a material consideration that carries substantial weight.
- 7.6 The framework sets out at paragraph 8 the three overarching objectives as follows:
- An economic objective - to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure
 - A social objective - to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and,

- An environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making efficient use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

7.7 The same paragraph confirms that these objectives are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives). The paragraph does not, however, state that net gains must be achieved across all three objectives for a proposal to constitute sustainable development.

7.8 In terms of advice contained in the NPPF regarding emerging Local Plan's or Neighbourhood Plans, paragraphs 47 -50 set out how these should be considered. The guidance states that local planning authorities may give weight to relevant policies in emerging plans according to:

- a) The stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);
- b) The extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
- c) The degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).

National Design Guide

7.9 In October 2019, the Government published the National Design Guide (NDG) to illustrate how well-designed places that are beautiful, enduring and successful can be achieved in practice. It forms part of the Government's suite of planning practice guidance. In addition to informing development proposals and their assessment by Local Planning Authorities, it supports paragraph 13 of the NPPF which states that permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.

8. **Affordable Housing Statement**

- 8.1 Core Strategy Policy CS9 requires the provision of, on average, 30-40% affordable housing on sites of 15 dwellings or more. Emerging Local Plan Policy H2 requires the provision of 30% affordable housing to be provided on sites outside of Havant Town Centre. In addition, 10% of the total number of new homes should be for shared ownership whilst the balance should be rented.
- 8.2 Further, the range, type and size of affordable housing should reflect the latest evidence of locally identified needs and contribute towards the creation of a mixed and balanced community. Affordable housing should be evenly spread across the site and integrated with, and indistinguishable from the rest of the development in line with Policy E1.
- 8.3 In line with the emerging Policy H2, the proposal seeks to provide 59 affordable dwellings (30%). 19 (33%) of the dwellings will be Shared Ownership whilst 39 dwellings will be Rented.
- 8.4 The proposed mix to be provided as affordable is as follows:

Type	Beds	Number	Size (sqft)
Apartment	1	10	538-664
Apartment	2	8	658-664
House	2	21	856
House	3	18	1008-1019
House	4	2	1149

- 8.5 The affordable dwellings are pepper-potted throughout the site. The houses are located in clusters of no more than 6 dwellings, whilst the apartment blocks are located towards the south eastern boundary.

9. Scheme Assessment

- 9.1 This section sets out the merits of the scheme and its compliance with national and local planning policy. It demonstrates the sustainability of the Site and its potential to provide for an existing and identified housing need through the provision of a well-designed development of 194 dwellings.

Principle of Development

- 9.2 Within the adopted Local Plan, the site lies outside of the urban area as defined by policies CS17 and AL2. These policies seek to restrict development in these locations, except in exceptional circumstances. In this instance, the proposal would not meet any of the exceptional circumstances.
- 9.3 It is therefore important to consider that in contrast, the emerging (submission) Local Plan seeks to allocate the site as part of Emerging Policy H15; Land east of Castle Avenue. Whilst the adopted Local Plan resists the principle of development in this location, the emerging plan clearly supports the principle and this must be given weight in the determination of this application.
- 9.4 It is also important to note that the remaining part of the allocation, to the west, benefits from planning consent for 69 dwellings. This application was approved in January 2021 on the same principle. This application was determined by the Development Management Committee in September 2020. The officer's report clearly states that one further consideration is the Borough's five-year supply of deliverable land for housing. In September 2020, the Borough stated that it had a five-year supply, but it was clear that this was reliant on development identified in the Pre-Submission Local Plan, including this site, coming forward. Without these developments, the Borough would inevitably not be able to maintain a constant five-year supply of housing land. Therefore, national policy considerations may be placed in the planning balance against the conflict with the current development plan. This statement now carries further weight given that it has since been confirmed that the land supply has been calculated by the Council at 4.4 years (Five Year Housing Land Supply, June 2021).
- 9.5 As a result, it is our view and that we believe of the Council's Planning Officers, that the tilted balance under Paragraph 11 of the NPPF is engaged, i.e. that permission should be granted unless adverse impacts of doing so would 'significantly and demonstrably' outweigh the benefits.
- 9.6 In this instance, there are no specific designations relating to the site nor is the site constrained by any designations listed in footnote 6 of the NPPF. Therefore, whilst the site

falls outside of the defined settlement boundary, there is a clear need to boost the supply of housing within the District and the delivery of 194 dwellings within the next 5 year period should attract significant weight.

- 9.7 Given the draft allocation alongside the absence of any clear reason for refusal, the significant benefits in favour of the development would significantly outweigh any harm and the principle should be found acceptable.
- 9.8 When considering the emerging allocation Policy H15, this sets out a number of application and development requirements that should be taken into account during the determination of this application. A table of compliance has been attached at Appendix C.
- 9.9 The allocation also requires that the site location and area do not prejudice future delivery of a link road. This link road is located to the east of the site, creating a new junction off the A27 providing access to a larger allocation north of the rail line. The site area has therefore been influenced by the road overlay and is submitted as part of the submission plans. It is evident that the proposal allows for suitable space and will not prejudice the delivery of the link road.

Housing Mix

- 9.10 In terms of mix, the proposals accord with Emerging Policy H4; Housing Mix which requires the provision of a range of dwelling types to meet identified local housing need. This should accommodate approximately 35% as two-bedroom homes. Proposals are expected to provide a range of housing type and sizes in line with the latest housing needs information.
- 9.11 The proposal seeks to provide 135 (70%) dwellings as market properties. The latest Housing Market Assessment, submitted as part of the supporting evidence base to the emerging Local Plan, appears to provide the most up to date housing need evidence (2014). The market mix is proposed as follows:

Beds	Proposed Mix	SHMA Mix
1	0 (0%)	5-10%
2	49 (36%)	30-35%
3	51 (38%)	40-45%
4	35 (25%)	15-20%

- 9.12 The proposal also seeks to provide 59 (30%) affordable dwellings with a 67:33 split of affordable rented to shared ownership housing, in accordance with Core Strategy Policy CS9 and emerging Policy H2.

Character and Design

- 9.13 Core Strategy Policy CS16 and Emerging Policy E1 state that planning permission will be granted where development meets amongst other criteria, the highest standards of design, providing a high-quality living environment in keeping with the character of the surrounding area.
- 9.14 The supporting Design and Access Statement clearly sets out the design ethos whilst providing street scenes and elevations to demonstrate the appearance, proposed materials and context with existing development.
- 9.15 The layout is designed around 4 key character areas; Outer Streets, Inner Streets, Parkside, and The Mews. Each character provides slight variations in terms of public realm, road widths and design, and building scale and form.
- 9.16 In terms of scale, all properties will be two-three storeys in height. The proposal provides for a mixture of detached, semi-detached and terraced properties. Four apartment blocks provide for the 18 apartments and are mainly situated at varying points along the eastern boundary.
- 9.17 In terms of materials, all of the proposed buildings feature red and multi-red brick to form the base of each plot with render to feature properties. There is a mixture of slate and clay style tiles for the roofs, which emulates existing development within the area. Design variations will include door canopies, dormers and bay windows. Detailing will include contrasting brick surrounds to doors and some windows, mid and plinth level string courses, contrasting brick stretchers over windows and some use of contrasting brick plinths. Whilst commensurate with the existing local character, these variations provide interest within the street scene.
- 9.18 Buildings will vary from 2 to 3 storeys with a mix of hipped and gable ended roofs. There will be a range of detached, semi-detached, terraced and apartment buildings interspersed around the site. The dwellings are positioned to form an outward facing development, where possible, but a need to provide noise mitigation has informed the design and position of dwellings adjoining the northern and southern boundaries.
- 9.19 The Site does adjoin recently approved residential development to the west. Suitable garden lengths alongside the retention of the existing vegetation means that the residential amenity of the existing residents will not be impacted in any way. In terms of the future residents, the layout provides ample private rear garden space with the apartments being provided with communal amenity space that could be used for socialising or simply for drying washing.

- 9.20 The proposal incorporates two key areas of open space totalling 0.534 with an additional linear stretch running the entirety of the eastern boundary (0.13 ha) leading into an area of open space and attenuation in the south-western corner of the site. The areas of open space are linked with a footpath that meanders through the eastern stretch. Additional native tree planting will allow for a sheltered walk down to the attenuation feature. The main area of open space will comprise a large play area, feature area and community orchard, facilitating local food growing opportunities.
- 9.21 Given the proposed use of high-quality materials, design variations and density that reflects the local character, the proposal is considered to be aligned with Core Strategy Policy CS16 and emerging Local Plan Policy E1.

Accessibility

- 9.22 The submission is supported by a Transport Assessment and Travel Plan. The Assessment demonstrates the sustainability of the site, situated within walking and cycling distance of local facilities in Warblington, Havant and Emsworth. Footways along St George's Avenue tie in with the existing footways on Castle Avenue, Warblington Avenue and Southleigh Road providing continuous routes towards local facilities. St George's Avenue also forms part of the National Cycle Network Route 2. The closest bus stops are located on Southleigh Road, within 40m of the site, serving Rowlands Castle, Havant and Emsworth. Warblington train station is also located 550m north-east of the site providing the West Coastway service.
- 9.23 Access is to be taken via St George's Avenue, extending 60m through the neighbouring development which also forms part of emerging allocation Policy H15. This is supported by a Stage 1 Road Safety Audit. The internal layout seeks to encourage low vehicular speeds by keeping straight sections of carriageway to a minimum. Continuous footways are also provided along the spine road throughout the development site. The design of the internal layout does not prejudice any future pedestrian/cycle link under the railway line to the north of the site, or connection to the existing footpath network and underpass to the south of the site.
- 9.24 443 car parking spaces are proposed throughout the proposal, including 49 visitor spaces, in line with the Parking SPD (2016). Secure cycle parking is provided within garages or secure cycle stores in rear gardens. For flats, these spaces will be provided within the parking court adjacent to each block.

Flood Risk and Drainage

- 9.25 The site is located within Flood Zone 1 (low probability of flooding). A Flood Risk and Strategic SuDS Assessment has been submitted in support of the application, following SuDS guidance provided by the Lead Local Flood Authority, County Council and National Planning Policy Guidance.
- 9.26 Groundwater Monitoring has been undertaken at the site which shows the ground water level recorded at various locations across the site periodically over 14 months. The data shows that groundwater flooding is a low risk however groundwater emergence is unlikely. Surface water mapping determines that the site is not at significant risk from surface water flooding.
- 9.27 The BGS records indicate that the site is underlain by London Clay. Whilst this would normally indicate that the site is not suited to infiltration, in this instance the recorded groundwater levels determine that there is potential for some level of infiltration but that it cannot be relied upon as the sole means of surface water discharge.
- 9.28 It is proposed to drain surface water flows to the nearest surface water sewer, located to the south west of the site, in compliance with the surface water hierarchy. It is proposed to surface the private drives and shared paved areas of the site with permeable paving which will provide storage and treatment. This will then discharge into surface water sewers and detention basin. Surface water release will then be restricted to the surface water sewer. This approach will be coupled with storage crates to ensure the site can accommodate the 1 in 100 year event plus 40% climate change.
- 9.29 Considering the above measures, the proposal is aligned with emerging Policy E19 Managing flood risk in new development which requires development to be safe over its lifetime without increasing flood risk elsewhere, with measures being appropriate to the character and biodiversity of the area. The proposal is also aligned with emerging Policy E20 Drainage infrastructure in new development in that the drainage systems meet the drainage needs over the lifetime of development as well as incorporating SuDS within the drainage strategy.

Landscape and Trees

- 9.30 The majority of existing trees and hedges will remain in place, creating established features of the periphery of the site. New planting of trees along the southern boundary will add to the feeling of being set within the landscape and will act as a visual and noise barrier to the existing A27 and proposed future junction. Additional tree and hedgerow planting of mixed shrubs will also ensure that ecological corridors are enhanced.

- 9.31 The application is supported by a Tree Survey Plan, Impact Assessment, Constraints Assessment and Tree Protection Plan. As the majority of trees are to be retained, the siting of dwellings and hardstanding has been considered in line with the tree survey plan and recommended distances from Root Protection Areas. The Tree Impact Assessment recommends adequate space be allowed for future growth of young and middle-aged trees, with shade and dominance to also be considered.
- 9.32 In terms of the landscaping associated with open space areas, this has been annotated on the hard and soft landscape plan (ref PLN-1-1110). The main central area of open space will comprise a play area to be seeded with Wear Tolerant Turfgrass which will site alongside a community orchard. Trees will also be dispersed at regular intervals around the perimeter. Other areas of open space will comprise natural grassland areas seeded with meadow mix whilst the SuDs area will be seeded with Pond Edge mix.
- 9.33 The above considerations ensure that the proposals are aligned with Core Strategy Policy DM8 and emerging Policy E18.

Ecology and Biodiversity

- 9.34 Core Strategy Policies CS11 and DM8 require development to protect and enhance the borough's statutory and non-statutory designated landscape, habitats and features of biological, hydrological or geological interest. Protection and enhancement should be achieved by adaptation and mitigation measures including creation of new habitats, water bodies and planting of new trees and woodland. The Policy also requires the protection of wildlife corridors in order to prevent the fragmentation of existing habitats to allow for species, such as Brent Geese, to respond to the impacts of climate change by making provision for habitat adaptation. In the emerging Local Plan, Policy E15 seeks to protect the Bechstein bat.
- 9.35 A desktop survey followed by an extended Phase 1 Habitat Survey took place in May 2020. The subsequent report concludes that direct effects on all of the designated sites within a 2km radius of the Site are considered unlikely as a result of development. The submission also includes a report to inform Stage 1 Screening and Stage 2 Appropriate Assessment of a Habitats Regulations Assessment (HRA).
- 9.36 In terms of on-site habitats and ecology, most of the habitats on site are common within the wider landscape and are of low value for biodiversity. Further surveys were recommended for Great Crested Newts, these were completed in May 2020 confirming the likely absence of GCN eDNA in waterbodies within 500m of the site. Further surveys were also recommended for reptiles, bats and badgers. These are on-going and will be submitted during the course of the application.

- 9.37 Enhancement was also recommended in the form of native planting and provision of bat and bird boxes. The landscaping proposals submitted in support of the application incorporate additional native planting to boundaries, street frontages and rear gardens. Bat and bird boxes can also be introduced where appropriate.
- 9.38 The site is also considered to be a site that is of low use by the Wader and Brent Geese. In order to mitigate the loss of 5.4ha of Low Use Site H19, a financial contribution will be made in accordance with the Solent Waders and Brent Goose Strategy. This comprises £35,610 per hectare which will be secured via S106 agreement to enhance, manage and monitor the wider Solent Wader and Brent Goose Network. This is addressed in further detail within the submitted HRA document and it is considered that the proposal is aligned with emerging Policy E17.

Archaeology

- 9.39 The proposal is supported by an Archaeological Desk Based Assessment and Geophysical Survey Report. These documents provide an assessment of the below ground archaeological potential in advance of the proposed development.
- 9.40 The assessment concludes that the site is not located within an Area of (High) Archaeological Potential and the proposed development will not impact on any designated archaeological assets. It does however note varying potential at the site for the Roman Period, bronze Age, Iron Age and Saxon and Medieval period.
- 9.41 The magnetometer survey was completed and did not record any magnetic responses that could be interpreted as being of definitive archaeological interest. Very weak trends and possible pit-like responses are visible which, given the series of undated cropmarks, might be anthropogenic.
- 9.42 The County Archaeologist has been provided with the above reports. They have confirmed that they do not feel that archaeological matters will emerge as an overriding issue and that whilst some further archaeological work will be necessary, this can be secured by use of conditions at a post determination stage.

Mineral Safeguarding

- 9.43 Published geological maps for the area indicate that the entire site is covered by a river terrace sand and gravel deposit, which is a safeguarded mineral resource. The solid geology on the site comprises the London Clay formation which is not a safeguarded mineral resource.

- 9.44 The submitted Mineral Resource Assessment concludes that the quantity of sand and gravel on the site is too small to be of any commercial value and the minerals will be indirectly sterilised by the proposed residential development directly adjoining the site's western boundary. The level of groundwater is 1 to 3 metres below ground level so total mineral extraction would result in a lake and the proposed development could not be built.
- 9.45 The mineral safeguarding policy within the Minerals and Waste Plan for Hampshire (2013) states that development without the prior extraction of mineral resources may be permitted if, inter alia, it would be inappropriate to extract mineral resources at that location or the merits of the proposed development outweigh the safeguarding of the mineral. We consider that this site meets both those criteria so prior extraction is not required.

Air Quality

- 9.46 Emerging Policy E23 Air Quality seeks to ensure that major development proposals provide mitigation measures which offset emissions in a manner that is proportionate to the scale and nature of the development. In addition, emerging allocation Policy H15 requires the submission of an Air Quality Assessment.
- 9.47 The supporting Air Quality Assessment is broken down into two stages; the construction phase and the operational phase. The desktop assessment identified that vehicle movements were likely to be the most significant local source of pollutants affecting the site and surrounds and thus the assessment modelled all roads within the immediate vicinity of the site.
- 9.48 Section 8 of the report sets out the proposed mitigation measures during each stage. During the construction phase, mitigation mainly relates to dust management, with these measures being incorporated into any future Construction Management Plan which is to be dealt with via condition. In terms of the operational phase, mitigation is not deemed necessary as the predicted level of significance associated with the additional vehicle movements at all modelled receptors is negligible. Mitigation measures are proposed within the associated travel plan to reduce the impacts of road traffic emissions.
- 9.49 Given the above mitigation measures set out within the Air Quality Assessment, the proposals are aligned with emerging Policy E23.

Nutrient Outputs

- 9.50 Due to the uncertainty over whether new development can be accommodated by existing wastewater treatment infrastructure without causing harm to coastal European sites, Natural England advise that all residential development should achieve nitrogen neutrality.
- 9.51 The assessment and full calculation is included within Section 4.4 of the HRA statement. The assessment proposed to offset this increase in nitrogen load against a further development under the control of the applicant which result in a decrease in total nitrogen – Land at Forty Acres Farm, Bedhampton (also known as Harbour Place). This site has full planning permission for 320 dwellings and a care home and is currently under construction (APP/18/00450). Land at Forty Acres Farm is located within the same catchment as the site and discharges to Budds Farm. A subsequent application has been made to increase the number of dwellings to 348. This results in a net decrease in total nitrogen of 164.067 Kg/TN/yr.
- 9.52 When taken in combination, the two developments result in a net decrease of 10.252 Kg/TN/yr. As the combined changes in land use will result in a net decrease in nutrient inputs into the Solent, there is no potential for an adverse effect on the integrity of the Solent European sites for nature conservation.

10. Sustainability Statement

- 10.1 Barratt David Wilson Homes support the principles of low-carbon design, reducing carbon emissions and ensuring lower energy costs for our customers. We follow a 'fabric first' approach to building design, maximising the performance of the components and materials of the building itself, before considering the use of mechanical or electrical building services systems. This includes insulation, high-performing windows and doors, increased air tightness and maximising passive solar gains.
- 10.2 Barratt David Wilson Homes continue to review and apply new technologies that help deliver energy efficiency such as waste water heat recovery, improved insulation around windows and doors and energy efficient boilers. Such measures enable an EPC rating of 'B' or above when homes are constructed and make them eligible for products such as Barclays Green Home Mortgages. When customers occupy their new homes they receive a guide to its sustainability features to help safeguard the environment and reduce ongoing energy costs.
- 10.3 The details of the sustainable credentials of the built form are likely to include:
- Use of sustainable resourced materials
 - Energy efficient buildings established through the fabric of the building
 - Accessible and adaptable homes
 - Energy display devices
 - AAA rated appliances
 - Water efficient homes to manage demand
 - Water butts fitted to collect rainwater for re-use
- 10.4 In addition, Barratt David Wilson are expecting to make provision of Electric Vehicle charging facilities available to each dwelling unit. We also anticipate provision of enhanced sustainability measures such as Photovoltaics following the introduction of Part L of the Building Regulations to be effected in 2021.

11. Lighting Assessment

- 11.1 The proposed development will require the installation of a number of luminaires that have the potential to increase existing light levels at sensitive locations within the vicinity of the site. Good lighting design also includes luminaires that have been selected to minimise light intrusion and glare to pedestrians and drivers. The lighting design criteria for the scheme will be taken from the following:
- BS EN 12464-2: Lighting of Work Places – Outdoor Work Places, 2014;
 - BS 5489-1: Code of Practice for the Design of Outdoor Lighting – Lighting of Roads and Public Amenity Areas, 2013; and,
 - BS EN 13201-2: Road Lighting – Performance Requirements, 2003.
- 11.2 The design of the lighting will be undertaken in a manner such as to address two conflicting needs; providing a safe environment for the movement of residents when the natural lighting levels fall, and the need to meet the light obtrusion limitations stated within the relevant standards and guidance in order to avoid any detriment to local amenity and wildlife.
- 11.3 As well as meeting the statutory design standards, the external lighting design will meet a number of criteria to ensure that the environmental effects of artificial lighting are managed to a high standard. These criteria will include:
- External lighting schemes must not have an upwards lighting ratio of more than 0.0%;
 - New column mounted luminaries shall be fitted with flat glass where appropriate to aid 0% upward light discharge.
- 11.4 We would expect a detailed Lighting Assessment to be addressed via a suitable worded condition as part of the decision notice. The Assessment would include the establishment of baseline ambient light conditions and an evaluation of impacts associated with the proposed lighting design. This would include the assessment of change in light obtrusion at existing receptor locations.

12. Planning Conditions, Infrastructure and Draft Heads of Terms

- 12.1 The Havant Borough Community Infrastructure Levy (CIL) Charging Schedule came into effect on the 1st August 2013. The site is located within Havant and thus is chargeable at £80 sqm plus indexation.
- 12.2 Key considerations to be included within any S106 agreement would relate, but are not limited to the following:
- Solent Waders and Brent Goose Strategy: Guidance on Mitigation and Off-setting Requirements (SWBGS, 2018). The Geese and Waders Mitigation Contribution comprises £35,610 per hectare (£192,294).
 - A contribution will be required towards the Solent Recreation Mitigation Strategy. The sum is calculated based on the number of bedrooms per individual dwelling.
 - A Nutrient Mitigation Contribution will not be required as set out within paragraphs 9.50-9.52 above.
 - The applicant recognises that a Road Traffic Regulation Order Contribution may be required, with the exact sum to be agreed.
 - The applicant recognises that a contribution towards a community worker may also be required, with the exact sum to be agreed.
 - The provision and mix of affordable housing will be set out within the Section 106 Agreement.

13. Conclusion

- 13.1 The proposal is for the development of 194 new residential dwellings, comprising a mix of 1-4 bed properties. The application submission follows consideration of the Core Strategy and the emerging Local Plan Policies alongside public consultation and local authority pre-application enquiries.
- 13.2 Whilst the site is currently located outside of any settlement boundary the site is allocated for residential development under Policy H15 of the emerging Local Plan. This, coupled with the Council's inability to demonstrate a suitable housing land supply (4.4 years) means that the tilted balance under Paragraph 11 of the NPPF is engaged, i.e. that permission should be granted unless adverse impacts of doing so would 'significantly and demonstrably' outweigh the benefits.
- 13.3 In this instance, there are no specific designations relating to the site nor is the site constrained by any designations listed in footnote 6 of the NPPF. Therefore, whilst the site falls outside of the defined settlement boundary, there is a clear need to boost the supply of housing within the District and the delivery of 194 dwellings within the next 5 year period should attract significant weight.
- 13.4 Given the draft allocation alongside the absence of any clear reason for refusal, the significant benefits in favour of the development would significantly outweigh any harm and the principle should be found acceptable.
- 13.5 The proposal will create social benefits in the form of affordable housing and a mix of dwellings to suit single occupants, families and downsizers. Economically, the proposal will aid the creation/maintenance of construction jobs, and also result in additional spending by new residents on local goods and services which is key in supporting community facilities. Environmentally, the proposal will retain existing trees and planting which will be further enhanced to ensure net biodiversity gain.
- 13.6 In terms of layout and design, the provision of 194 dwellings alongside on-site open space creates a net density of 35dph. In order to avoid the creation of a very uniform, linear proposal, careful consideration has been given to the road layout, siting of plots, the use of materials and also trees and planting to break up the street scene, adding variation and character.
- 13.7 Overall, the proposal comprises sustainable development which complies with the spatial objectives of the Core Strategy and Emerging Local Plan documents.

APPENDIX A

Accommodation schedule demonstrating suitable mix and NDSS compliance

Schedule Of Accommodation

Client: BDW Southampton
Site Name: Land off St Georges Avenue, Havant
Project Ref: 201618
Revision: -
Date: 21/06/2021



PRIVATE						
House Type	Reference	Storeys	Description	Total No	Sqft	Total Sqft
RADLEIGH	RAD	2	4 Bedroom House	10	1317	13170
ALDERNEY	ALD	2	4 Bedroom House	10	1245	12450
WOODCOTE	WOO	2.5	4 Bedroom House	12	1340	16080
CHESTER	CHE	2	4 Bedroom House	3	1126	3378
MORSEBY	MOR	2	3 Bedroom House	10	919	9190
MAIDSTONE	MAI	2	3 Bedroom House	24	923	22152
ELLERTON	ELL	2	3 Bedroom House	17	923	15691
DENFORD	DEN	2	2 Bedroom House	19	768	14592
KENLEY	KEN	2	2 Bedroom House	18	768	13824
FALKIRK	FAL	3	2 Bedroom Apartment	12	680	8160

Total Private	135		128687
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AFFORDABLE						
House Type	Reference	Storeys	Description	Total No	Sqft	Total Sqft
54	54	2	4 Bedroom House	2	1149	2298
55	55	2	3 Bedroom House	7	1019	7133
52	52	2	3 Bedroom House	11	1008	11088
51	51	2	2 Bedroom House	21	856	17976
2BF	2BF	3	2 Bedroom Apartment	4	658	2632
2BF	2BF	3	2 Bedroom Apartment	4	664	2656
1BF	1BF	3	1 Bedroom Apartment	6	538	3228
1BFWC	1BFWC	3	1 Bedroom Apartment	2	658	1316
1BFWC	1BFWC	3	1 Bedroom Apartment	2	664	1328

Total Affordable	59		49655
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Grand Total	194		178342
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Site Area (ha)	5.40	Affordable %	30%
Site Area (A)	13.34	Overall 1 Bed %	5%
Nett Site Area (ha)	4.34	Overall 2 Bed %	40%
Nett Site Area (A)	10.72	Overall 3 Bed %	36%
Density 1 (Sq.Ft/A)	16630	Overall 4+ Bed %	19%
Density 2 (Units/ha)	36		

APPENDIX B

Pre-application layout for 196 dwellings and pre-app response 1 (April 2021)



N

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Rev	Date	Drawn	Checked
A	27/11/20	MJW	
REVISED IN LINE WITH CLIENTS COMMENTS.			
B	27/11/20	MJW	
LEGEND UPDATED, NOISE ZONES CLARIFIED.			
C	05/01/2021	SD	
ADJUSTMENTS MADE TO BOTH MIX AND LAYOUT TO A.T. COMMENTS			
D	05/01/2021	MJW	
LAYOUT COLOURED.			

PRIVATE						
House Type	Reference	Storeys	Description	Total No	Sqft	Total Sqft
RADUEGH	RAD	2	4 Bedroom House	9	1317	11853
ALDERNEY	ALD	2	4 Bedroom House	9	1225	11025
WOODCOTE	WOO	2.5	4 Bedroom House	12	1217	14604
CHESTER	CHE	2	4 Bedroom House	8	1032	8256
ENNERDALE	ENN	2	3 Bedroom House	6	917	5502
MORSEBY	MOR	2	3 Bedroom House	6	854	5124
MAIDSTONE	MAI	2	3 Bedroom House	22	830	18260
ELLERTON	ELL	2	3 Bedroom House	23	830	19090
DENFORD	DEN	2	2 Bedroom House	29	624	18096
FALKIRK (GF)	FAL	3	2 Bedroom Apartment	4	637	2548
FALKIRK (FF/SF)	FAL	3	2 Bedroom Apartment	8	665	5320
Total Private				134		119678

AFFORDABLE						
House Type	Reference	Storeys	Description	Total No	Sqft	Total Sqft
S4	S4	2	4 Bedroom House	1	1103	1103
S5	S5	2	3 Bedroom House	1	957	957
S2	S2	2	3 Bedroom House	18	917	16506
S1	S1	2	2 Bedroom House	20	838	16760
2BF	2BF	3	2 Bedroom Apartment	10	690	6900
1BF	1BF	3	1 Bedroom Apartment	6	480	2880
1BFWC	1BFWC	3	1 Bedroom Apartment	2	690	1380
Total Affordable				58		46486
Grand Total				194		166164

Site Area (ha)	5.21	Affordable %	30%
Site Area (A)	12.87	Overall 1 Bed %	4%
Nett Site Area (ha)	4.28	Overall 2 Bed %	37%
Nett Site Area (A)	10.58	Overall 3 Bed %	39%
Density 1 (Sq.ft/A)	15712	Overall 4+ Bed %	20%
Density 2 (Units/ha)	37		

Legend

Application Boundary

Sales Area

*

Affordable Rent

*

Shared Ownership

Noise Zones

Taken from 24 Acoustics report - R7448-1 Rev 0

20m flat zone.
No private amenity space.
acoustic glazing required to A27 facing habitable rooms.
Alternative means of ventilation/preventing of overheating required throughout.

25m non-developed zone.
(Suitable for service road and car parking)

PRELIMINARY ISSUE

Project:
SAXONS CORNER
ST. GEORGES AVENUE
EMSWORTH

Drawing Title:
SITE LAYOUT

BARRATT
HOMES

carlton

design partnership

Sewyn House, 350 Castle Way, Southampton, SO14 2AW
023 8011 8844 www.carltondesignpartnership.com

1:1000 0 10 20 30 40 50m
@A1

Dwg No: Rev: D

Ms Ellie White
Henry Adams Planning
Rowan House
Baffins Lane
Chichester
PO191UA

Our Ref: GEN/21/00049
Direct Line: (023) 02392 446263
Ask For: Mr L Oliver
Email: planning.development@havant.gov.uk

12 April 2021

Site Location: Land East of, Castle Avenue, Havant

Re: Pre-application request for construction of 196 residential dwellings and a Screening Opinion request.

Dear Ms White,

I am writing to you further to your enquiry received on the 15 January 2021 regarding the above address. Please accept my apologies for the delay in my response.

Having reviewed the submission and following our meeting, it is considered that the following material planning considerations are relevant:

1. The principle of development
2. The proposed housing mix, including level of affordable housing
3. The impact on the character and appearance of the area, including the proposed layout
4. Impact on amenities of neighbouring properties and future occupants
5. Impact on the highway network
6. Impact on ecology
7. Impact on archaeology
8. Impact on drainage
9. Developer contributions - including Education

The following policies are relevant to this pre-application response:

- CS9 Housing
- CS17 Concentration and Distribution of Development within the Urban Areas.
- AL2 Urban Area Boundaries and Undeveloped Gaps between Settlements
- CS21 Developer Requirements
- DM6 Coordination of Development
- DM8 Conservation, Protection and Enhancement of Existing Natural Features
- DM10 Pollution
- DM13 Car and Cycle Parking on Residential Development.
- DM23 Sites for Brent Geese and Waders
- DM24 Recreational Disturbance to Special Protected Areas (SPAs) from Residential Development.
- Havant Borough Council Housing SPD (July 2011)
- Havant Borough Council Parking SPD (July 2016)
- Hampshire Minerals & Waste Plan

Havant Borough Local Plan

In 2019, the Council consulted on a Pre-Submission Local Plan under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). However, there has been a near 18-month delay to submitting the Plan due to the need to respond to the Dutch Case and ensure that all new development can be nutrient neutral.

The Council subsequently consulted on the proposed changes to the Pre-Submission Plan under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) for public consultation between 3 November 2020 to 17 December 2020. The proposed changes include a strategic mitigation solution for addressing nutrient neutrality.

The Havant Borough Local Plan was submitted to the Secretary of State for Housing Communities and Local Government for examination on 12 February 2021. An inspector will now be appointed on behalf of the Secretary of State to undertake an examination of the plan.

Until that time, the emerging Local Plan is a material consideration in the assessment of this planning application in accordance with paragraph 48 of the NPPF. This confirms that weight may be given to policies in emerging plans depending on a number of factors. Based on the current stage of preparation, along with the fact that the policies are compliant with the NPPF, the policies within the emerging Local Plan referenced below are currently afforded limited weight, dependent on the extent to which there are unresolved objections to relevant policies.

The relevant planning policies of the emerging Local Plan are:

DR1 - Delivery of Sustainable Development

DR2 - Regeneration

IN1 - Effective Provision of Infrastructure

IN2 - Improving Transport Infrastructure

IN3 - Transport and Parking in new development

IN5 - Future management and management plans

E1 - High Quality Design

E2 - Health and wellbeing

E3 - Landscape and settlement boundaries

E6 - Best and most versatile agricultural land

E9 - Provision of public open space in new development

E12 - Low Carbon Design

E13 - Historic Environment and heritage assets

E14 - The Local Ecological Network

E15 - Protected Species

E16 - Solent Special Protection Areas

E17 - Solent wader and Brent Goose feeding and roosting sites

E18 - Trees, hedgerows and woodland

E19 - Managing flood risk in new development

E20 - Drainage infrastructure in new development

E22 - Amenity and pollution

Housing

H1- High Quality Homes

H2 - Affordable Housing

H3 - Housing Density

H4 - Housing mix

H15 - Land East of Castle Avenue

1. The principle of development

In the adopted local plan, the site lies outside of the urban area as defined by policies CS17 and AL2. These policies seek to restrict development in these locations, except in exceptional circumstances. I do not consider that any of the exceptions in the policy apply here, the proposal being a major scheme on greenfield land.

By contrast, the Submission Local Plan includes a site allocation for the Land East of Castle Avenue (Policy H15).

Overall, while the adopted Local Plan resists the principle of development in this location, the

emerging plan clearly supports the principle, and this must be given weight in the determination of this application.

Development Requirements

The emerging site allocation policy H15 sets out development requirements which should be taking into account during the determination of this application. In terms of other policies within the plan, the application will need to be supported by a table of compliance to see how the scheme complies with emerging policies, for matters such as open and play space policies E9 and E11, low carbon design - policy E12, technical housing standards -policy H1, electric vehicle charging points - policy IN3. In addition some further key matters are highlighted below.

Policy DR2 - Regeneration outlines the Councils vision for regeneration. This encompasses both a Council led programme of regeneration and the effective use of brownfield land. This policy also focuses on boosting local skill levels and community integration. As part of this element the policy outlines that developments of this nature will contribute towards a community officer, to help new residents in the development integrate into existing communities.

Minerals Safeguarding

Policy 15 of the Hampshire Minerals and Waste Plan seeks to prevent the needless sterilisation of Mineral Resource by other development. The policy and the associated Minerals and Waste Safeguarding SPD therefore define a Minerals Safeguarding Area (MSA) where prior extraction of minerals should be considered before development takes place. The Minerals and Waste Consultation Area (MWCA), is the area where LPAs are required to consult HCC. This site lies within the MSA/MWCA. HCC have provided a detailed response, which has been forward to you outlining the requirements with regard to any future planning application.

Design & Layout

The council has identified a Strategic Site to the north of the railway line, capable of providing around 2,100 homes (see Policy KP5 of the Submission Local Plan). As part of the delivery package for that site, a direct access onto the A27 may be needed. Land is safeguarded for this purpose through policy IN2 of the Submission Plan. While it does not appear that the proposal encroaches onto this land, it has also not been obviously considered in the constraints or opportunities analyses, in terms of land take, noise impact nor opportunities to connect to it. I note that we discussed this matter in detail at our meeting and that you are looking to address this matter in detail, with emerging survey work and overlays to demonstrate that this area of land is safeguarded.

To the south west of the site, a pedestrian and cycle link exists. The opportunities plan recognises this, but it is not reflected in the proposed layout. A connection to this route should be sought, in order to provide a safe and convenient link out of the site (see also emerging transport policy IN3). This is reinforced by the discussions that members had for application APP/18/01033, where any pedestrian/cycle links in the vicinity will provide better connections and help to reduce pressure on the use through the only access to the site, which is along St Georges Avenue, then flowing onto the surrounding roads. In terms of an update from our meeting I have spoken with Jacqueline Boulter in our Planning Policy Team, regarding an update on the progress of the potential access to the subway, and the current position/development of a new access route, at this point there is no update. However, I provided the contact details of Jacqueline below so that you can request further updates as the scheme progress:

Email: Jacqueline.Boulter@havant.gov.uk Telephone : 023 9244 6533

2. The proposed housing mix, including level of affordable housing

Policy H4- Housing mix outlines that development will be expected to provide a range of dwelling types to meet identified local housing need; and incorporate approximately 35% as

two-bedroom homes as part of the overall housing mix. From my understanding of the submitted documents 71 units out of 194 would be two-bedroom units, which equate to 36%, and therefore complies with this emerging policy.

In terms of Affordable Housing provision, the development proposes 58 units of 196 to be affordable, which equates to 29.5%, slightly below the 30% provision required by policy. A financial contribution would be sought to make the shortfall identified as above.

Due to staff absence we do not have comments from the Housing Officer as to whether the affordable housing mix is acceptable, this will be forward under separate cover when they are available. At our meeting we discussed the layout of the Affordable units and that they are concentrated to the north and south, which are adjacent to the noisiest parts of the site. In the debate at Planning Committee for application APP/18/01033, this was part of a detailed debate, where members raised concerns that the affordable units had been located in the least desirable areas, from the submitted layout plan the majority of these units are in these area, and every effort should be taken to enable these units to be pepper potted across the site.

3. The impact on the character and appearance of the area, including the proposed layout

In terms of the Local Planning Authorities response of this matter it is based on the submitted layout plans, and we have not seen elevational details. As was discussed at our meeting there are areas that need to be addressed, and it is noted that you are looking to break up the long parking bays, which result in elements of the development being dominated by hardstanding. In addition in general layout terms it is considered that there is further scope for landscaping, some of the residential areas lack landscaping, particularly trees or hedging, providing further landscaping will enhance the scheme, and this was a matter discussed at the Planning Committee for the neighbouring site.

The proposed layout shows open space and place space, the details of this will need to be explored further, to meet the requirements in policies E9 and E11 for food growing and types of leisure and recreation provision. In terms of the location of the open space, which is defined by three areas, as was highlighted in the meeting the area in the South Wester corner will be located in a quite an isolated location, in close proximity to the A27, and of course the potential link road, we do have concerns that the amenity for future users would be dominated by noise, and could potential become a piece of left over land that is not used for any purpose, though potential does exist for pedestrian/cycle links which is considered below.

There are several trees on this site and as such we would require any development plans to consider these trees as materiel constraints when assessing the plans for the future of the site. As part of any application that is brought forward, we would require an AIA so as to assess and make informed decision

4. Impact on amenities of neighbouring properties and future occupants

The Design Guide SPD requires 20 metre back-to-back separation distances between properties. This development would be assessed against the impact of the neighbouring development which is currently under construction. We would need to be assured that these requirements are satisfied. It is noted that the units at the entrance are set behind the permitted adjacent dwellings, this location in combination with scale and bull could have an adverse overbearing impact on these permitted units, this therefore needs to be considered in further detail.

In terms of the impact on the amenity of future occupants and the required level of amenity space outlined in the SPD, which requires 10m long gardens. This would need to be demonstrated in plan form in any subsequent planning application.

The Environmental Health Team have raised concerns about the proposed acoustic

mitigation, this site is more difficult than the neighbouring site because as the site narrows to the East the land gets more marginalised in terms of its acceptability. The road noise is the most problematic overall because it is an elevated noise source. There are the difficulties of screening the elevated road noise sources because the land required to do so is not in the ownership of the applicant so this compounds the noise issues.

Further significant concerns about the proposed development both from a noise and potential overheating perspective. The noise report states the following - the wording highlighted below of particular concern:

It will be necessary to engineer the buildings to ensure that internal noise levels in habitable rooms are commensurate with the requirements of BS 8233:2014. This may be achieved by keeping windows closed and, where necessary, by using glazing with enhanced sound insulation. Where reliance is made on windows being closed as a form of acoustic mitigation alternative means of ventilation must be provided. As a minimum this will include background ventilation which may be provided by trickle vents in the head of the windows or, where the noise environment requires this, by acoustically rated background vents (such as those produced by Ryton etc.). It is generally accepted that opening windows for short periods of time (and hence tolerating an increased noise environment) is acceptable to provide purge ventilation, however, there is concern about, and emerging guidance relating to, overheating in buildings which require windows to be closed as a means of noise mitigation. As stressed above, it is likely that it will be necessary to consider measures to prevent overheating. In time it is possible (likely) that this may become a planning requirement and BDW must therefore be aware of the need to demonstrate that overheating will not occur in these properties- ideally by design (such as minimising window areas, habitable rooms which are south facing and even considering the provision of mechanical ventilation and cooling systems). You may need to obtain specialist advice in this area.

6.8 We anticipate that the entire site, regardless of building orientation will be reliant on closed windows in order to achieve a satisfactory internal noise environment. It is likely therefore that consideration will need to be given to thermal gain in the dwellings on this basis. In many cases these may comprise standard double glazing and trickle vents, however, specialist acoustically rated glazing and vents will be required to habitable rooms in throughout in the flat blocks and on the A27 facades in the first row of housing facing the A27. It is recommended that consideration be given to the layout of these dwellings to minimise the number of habitable rooms facing the road (and hence minimise the need for acoustically rated glazing).

Before this matter can be fully assessed an acoustics and overheating assessment will need to be undertaken to take into account the likelihood that all properties will have some sealed facades. It will need to follow the overheating assessment methodology described in CIBSE 'Design methodology for the assessment of overheating risk in homes' ('TM59'); and the Acoustics, Ventilation and Overheating Guide ('AVO Guide') Residential Design Guide Published in January 2020 by the Association of Noise Consultants It recommends an approach to acoustic assessments for new residential development that take due regard of the interdependence of provisions for acoustics, ventilation, and overheating. Application of the AVO Guide is intended to demonstrate good acoustic design as described in the ProPG: Planning & Noise, May 2017 ('ProPG'), when considering internal noise level guidelines.

5. Impact on the highway network

The impact on the highway network, with the only vehicular access being from St Georges Avenue, and immediate surrounding residential roads, was a particular concern for the neighbouring site. As such we would strongly urge you to undertake pre-application advice with the Highway Authority, so that this can be fully considered in any application, and any associated mitigation that would be required.

In terms of the required parking provision, these standards are set out in our parking SPD, which outlines the required level of parking provision for each dwelling, in addition it outlines

the required level of visitor parking provision, which requires 20% additional provision for visitors. In any submission the number of bedrooms must be clearly labelled on all floor plans, and therefore consistent with parking/layout plans, so that the Local Planning Authority can ensure that the appropriate level of provision.

In the debate at Planning Committee, for the neighbouring application site, concerns have been raised regarding the restrictions that housing developers place on commercial vehicles on development sites, which results in these vehicles parking on surrounding residential streets and causing associated disruption. This concern was originally raised by a the Barratts scheme to the north of the railway line, at Manor Farm Nurseries. To address this issue a Traffic Regulation Order (TRO) was proposed, which will be secured by a legal agreement, so that in the event this does become an issue, appropriate measures to control the parking arrangements can be made as necessary for the surrounding streets.

6. Impact on ecology

The site is identified under the adopted Local Plan as being a site possibly used by Brent Geese and waders. Development proposals on, or adjacent to, sites which are used by Solent waders and/or Brent Geese need to be assessed in line with the appropriate regulations. This proposal will, therefore, require a project level Habitats Regulations Assessment (HRA) and, if necessary, an Appropriate Assessment (AA).

The Council will consider the Solent Waders and Brent Goose (SWBG) Strategy and the latest survey data when making such an assessment.

Recent survey work suggests that this is a 'low use' site. In line with policy E17 of the Pre-Submission plan, on low use sites, permission should only be granted where:

- a. On site mitigation is provided which is based upon appropriate ecological assessments to the satisfaction of the Local Planning Authority and Natural England; or
- b. A financial contribution is provided consistent with the Solent Wader and Brent Goose (SWBG) Strategy.

It is noted that the applicant's ecological appraisal recommends surveys of overwintering birds. We would strongly advise you to utilise Natural England's pre-application service in order to understand the relevant points on this matter.

Protected species

It remains the case, however, that information supporting this application sufficient to assess whether protected species are likely to be affected and, if they are, whether sufficient mitigation, avoidance or compensation measures will be put in place.

Deterioration of the water environment

With regard to the integrity of the designated sites, we advise that there is currently uncertainty as to whether the increase in waste water from new housing in the Solent catchment will have an adverse effect on the international sites.

There is existing evidence of high levels of nitrogen and phosphorus in the Solent water environment with evidence of eutrophication at some designated sites. The Partnership for Urban South Hampshire (PUSH), Natural England (NE), and Environment Agency (EA) have been jointly working to develop an Integrated Water Management Strategy (IWMS). This examines the potential for the PUSH region to accommodate future housing growth without having a detrimental effect upon the water environment. A Water Quality Working Group has been set up to identify and analyse the existing evidence gaps and evaluate the need for strategic mitigation measures. However, there is currently uncertainty as to whether there is sufficient capacity to accommodate the new housing growth.

The proposal comprises new housing development and has inevitable waste water implications. It is these implications, and all other matters capable of having a significant

effect on designated sites in the Solent, must be addressed in the ways required by Regulation 63 of the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019.

As such there is a likely significant effect on the internationally designated sites (SPA, SAC, pSPA) due to the increase in waste water from the new housing. As you are aware, where there is a likelihood of significant effects (excluding any measures intended to avoid or reduce harmful effects on the European site), or there are uncertainties, a competent authority should fully assess (by way of an "appropriate assessment") the implications of the proposal in view of the conservation objectives for the European site(s) in question. Appropriate assessments cannot have lacunae and must contain complete, precise and definitive findings and conclusions capable of removing all reasonable scientific doubt as to the effects of the works proposed on the protected site concerned. Complete information is required to ensure that the proposal will not affect the integrity of the international sites.

The applicant needs to submit the following information ideally before submitting a full planning application as we need to discuss the applicant's approach with Natural England and seek their views on the proposed approach given its innovative nature and their role as the statutory consultee under the Habitat Regulations.

We would need to have nutrient budget calculations for both the application site and the mitigation sites, outlining how much mitigation is available at the sites, and how much the applicant wishes to use of their nutrient credits at the mitigation site, basically an audit trail of nutrient credits. Along with that the applicant would need to submit scientific evidence showing the scientific link between the proposed mitigation sites and the application site in order to undertake an HRA.

Solent Recreation Mitigation Partnership (SRMP)

The application site is within 5.6km of the Solent and Southampton Water Special Protection Area (SPA) and will lead to a net increase in residential accommodation. To address any potential significant effects, any forthcoming planning application will need to comply with adopted planning policy to mitigate against adverse effects from recreational disturbance on the Solent SPA sites, as agreed by the Solent Recreation Mitigation Partnership (SRMP) Definitive Strategy.

7. Impact on archaeology

Although there are no archaeological sites currently recorded at this location, crop marks recorded on the HER do suggest some archaeological activity, although of unknown date and character, exist within the site. It is also noted that when land was developed to the east and to the north, and were subject to archaeological survey, archaeological remains were encountered. The site has a high archaeological potential, that is the likelihood that archaeological remains as yet unrecorded will be impacted by development.

Given the high archaeological potential any planning application should be accompanied by a Heritage Statement that reviews the archaeological potential of the site, the impact of development and of past land use, and sets out a suggested strategy to mitigate the impacts of development on archaeological remains.

8. Impact on drainage

Southern Water have provided a response, which has been forwarded to you. In terms of drainage of the scheme, in the neighbouring site extensive and prolonged discussions were undertaken between the applicant, Southern Water and the Local Lead Flood Authority, we would strongly recommend engagement is undertaken with these bodies to ensure that the drainage strategy proposed, which should use SuD's are undertaken at this point, to avoid delays during the application process on this matter.

9. Developer contributions - including Education

Community Infrastructure Levy (CIL)

The dwellings would be CIL Liable, in accordance with our CIL Charging Schedule:
<http://www.havant.gov.uk/sites/default/files/documents/HBC%20CIL%20Charging%20Schedule%20Full%20Document%20Feb%202013.pdf>

The amounts in the Charging Schedule are indexed according to the year in which permission is issued, if a permission is issued in 2021 the amount of indexation would be 48.66%. This could vary if permission is issued in 2022. It should be noted that the CIL Charging Schedule is currently under review alongside the Pre-submission Local Plan. When submitting an application this would need to be accompanied by CIL Forms 1 and 2. CIL Form 10 will be required to consider granting of Mandatory Social Housing Relief. If the development is to be phased, then this must be decided before a decision is made

Education

The Local Education Authority has advised that since then new pupil forecasts have been produced which now show that no such contribution is required as there are sufficient places within Havant to accommodate the anticipated yield of pupils from this development. The need for additional secondary places is that no contribution will be sought for additional secondary school places with Havant. In short no contribution will be sought for either primary or secondary school places from this development at this current time.

S106

Subject to statutory consultee responses we would expect the S106 to include (amongst any other site-specific obligations necessary):

1. Affordable Housing
2. HBC Monitoring Fees
3. HCC Monitoring Fees
4. Management Company
5. Management Plan (may include SUDS)
6. Solent Recreation Mitigation Strategy
7. Nutrient Neutrality (<https://www.havant.gov.uk/nitrogen-developers>)
8. Employment and Skills Plan
9. Education (HCC)
10. SUDS/SUDS Bond (Bond not necessary if Southern Water have agreed to adopt SUDS once installed)
11. Highway Works (HCC)
12. Site Specific Transport Improvements (HCC)
13. Footpath and access (HCC)
14. Community Worker
15. Others arising out of consultee responses

Please see the HBC Developer Contributions guide for additional information Latest version accessible from: <https://www.havant.gov.uk/community-infrastructure-levy>

Please note that the above comments are the opinion of individual Planning Officers and are in no way binding upon the Council when determining any future applications for planning permission and nor will they prejudice the outcome of any applications submitted.

This advice also only relates to planning matters, and does not relate to any other application that may be required under Building Regulations or under any other Act, Regulation, Byelaw or Order where the Council's approval may be needed. For further guidance as to the need for consent under the Building Regulations please phone 02392 446571

Yours sincerely

Mr L Oliver
Principal Planner
Our Ref: GEN/21/00049

APPENDIX C

Table demonstrating Policy Compliance with the Emerging Local Plan and specifically emerging allocation Policy H15.

Policy	Addressed	Comments
Hampshire Waste and Minerals Plan	Yes	Mineral Assessment Submitted
Core Strategy		
CS9 Housing	Yes	Planning Statement (mix, affordability, density)
CS17 Concentration and Distribution of Development within the Urban Areas	Yes	Addressed via accordance with emerging Policy H15
AL2 Urban Area Boundaries and Undeveloped Gaps between settlements	Yes	Addressed via accordance with emerging Policy H15
CS21 Developer Requirements	Yes	Planning Statement Section 12
DM6 Coordination of Development	Yes	Aligned with Emerging Allocation H15
DM8 Conservation, Protection and Enhancement of Existing Natural Features	Yes	Landscape Plans
DM10 Pollution	Yes	Noise Assessment, Air Quality Assessment, Drainage Statement, Lighting Assessment
DM13 Car and Cycle Parking on Residential Development	Yes	Transport Assessment and Travel Plan
DM23 Sites for Brent Geese and Waders	Yes	HRA Statement
DM24 Recreational Disturbance to SPAs from Residential Development	Yes	HRA Statement
Parking SPD	Yes	Transport Assessment
Emerging Local Plan		
DR1 Delivery of Sustainable Development	Yes	Planning Statement
IN1 Effective provision of infrastructure	Yes	Transport Assessment and Travel Plan
IN2 Improving Transport Infrastructure	Yes	Transport Assessment and Travel Plan
IN3 Transport and Parking in new development	Yes	Transport Assessment and Travel Plan
IN5 Future Management and management plans	Yes	Planning Statement
E1 High Quality Design	Yes	DAS
E2 Health and wellbeing	Yes	DAS and Transport Assessment
E3 Landscape and settlement boundaries	Yes	DAS
E9 Provision of public open space in new development	Yes	Within Layout
E12 Low carbon design	Yes	Sustainability Statement

E13 Historic Environment and heritage assets	Yes	Archaeological Desk Based Assessment & Geophysical Survey Report
E14 The local ecological network	Yes	Ecology extended Phase 1
E15 Protected species	Yes	Ecology extended Phase 1, Phase 2 reports and HRA Statement
E16 Solent Special Protection Areas	Yes	HRA Statement
E17 Solent Wader and Brent Goose feeding and roosting sites	Yes	HRA Statement
E18 Trees, hedgerows and woodland	Yes	Impact Assessment, Tree Constraint Assessment, Tree Constraints Plan, Tree Protection Plan, Landscape Strategy
E19 Managing flood risk in new development	Yes	FRA and SuDS report
E20 Drainage infrastructure in new development	Yes	FRA and SuDS report
E22 Amenity and pollution	Yes	Air Quality Assessment
H1 High Quality Homes	Yes	DAS and Planning Statement
H2 Affordable Housing	Yes	Planning Statement
H3 Housing Density	Yes	Planning Statement
H4 Housing Mix	Yes	Planning Statement
H15 Land east of Castle Avenue	Yes	See below.

Policy H15 Requirements		
Environmental Statement (if Required)	No	Not required
Transport Assessment and Travel Plan	Yes	Transport Assessment and Travel Plan
Ecological Assessment	Yes	Ecology extended Phase 1, Phase 2 reports and HRA Statement
Flood Risk Assessment	Yes	FRA and SuDS report
Archaeological Assessment	Yes	Archaeological Desk Based Assessment & Geophysical Survey Report
Air Quality Assessment	Yes	Submitted
Noise Impact Assessment	Yes	Submitted
Contaminated Land Investigation Report (to include gas monitoring)	No	
Arboricultural Assessment	Yes	Submitted
Minerals & Mining (to be agreed with HCC)	Yes	Submitted
Solent Waders & Brent Geese Mitigation	Yes	Within Ecology Assessment